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May 17, 2001

Docket Control
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007

Re: ACC Docket No. T-00000A-00-0194

Dear Docket Control:

Enclosed please find the original and ten (10) copies of the ***Errata to the Direct Testimony of Roy Lathrop*** on behalf of WorldCom, Inc., AT&T Communications of the Mountain States, Inc., and XO Arizona, Inc., in the above-referenced matter. This errata is being served in accordance with the attached certificate of service. If you have any questions, please contact me at the phone number, or e-mail address, above.

Very truly yours,

Davis Wright Tremaine LLP

Larry J. Weathers
Paralegal

Enclosures

cc: Mary Steele
Rick Wolters
Roy Lathrop
Caroline Butler, ACC

BEFORE THE ARIZONA CORPORATION COMMISSION

WILLIAM A. MUNDELL
Chairman
JAMES M. IRVIN
Commissioner
MARC SPITZER
Commissioner

IN THE MATTER OF INVESTIGATION INTO U S WEST COMMUNICATIONS, INC.'S COMPLIANCE WITH CERTAIN WHOLESALE PRICING REQUIREMENTS FOR UNBUNDLED NETWORK ELEMENTS AND RESALE DISCOUNTS	**DOCKET NO. T-00000A-00-0194** **WORLDCOM, AT&T, AND XO'S NOTICE OF FILING ERRATA**

WorldCom Corporation, Inc., AT&T Communications of the Mountain States, Inc., and XO Arizona, Inc., herein provide notice of errata to the Direct Testimony of Roy Lathrop which was filed in the above-named matter on May 16, 2001.

RESPECTFULLY SUBMITTED this 25th day of June 2001.

DAVIS WRIGHT TREMAINE L.L.P.

Mary Steele
DAVIS WRIGHT TREMAINE LLP
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Mountain States, Inc. and XO Arizona, Inc

WILLIAM A. MUNDELL
Chairman
JAMES M. IRVIN
Commissioner
MARC SPITZER
Commissioner

IN THE MATTER OF INVESTIGATION INTO U S WEST COMMUNICATIONS, INC.'S COMPLIANCE WITH CERTAIN WHOLESALE PRICING REQUIREMENTS FOR UNBUNDLED NETWORK ELEMENTS AND RESALE DISCOUNTS	DOCKET NO. T-00000A-00-0194

Errata

to the Direct Testimony of

ROY LATHROP

on Behalf of

the Joint Case of

WORLDCOM, Inc.

AT&T Communications of the Mountain States, Inc.

and

XO Arizona, Inc.

June 25, 2001

Q. PLEASE STATE YOUR NAME AND TITLE.

A. My name is Roy Lathrop. I am an Economist in the Regulatory Analysis group of WorldCom Inc.'s ("WorldCom") Law and Public Policy Section.

Q. ARE YOU THE SAME ROY LATHROP THAT FILED DIRECT TESTIMONY ON MAY 16, 2001 IN THIS PROCEEDING?

A. Yes, I am.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to provide a portion of Exhibit RL-1 (the NRCM User's Guide) that was inadvertently omitted from the CD that contained a variety of Exhibits. A paper copy of the NRCM User's guide is attached to this testimony. In addition, this testimony provides revised costs for certain collocation elements. These cost revisions arise as a result of the incorrect implementation of recommendations I made in my Direct Testimony regarding Qwest's collocation cost model. The implementation errors occur in four areas.

First, the land and building factors that I recommended in my direct testimony be set at zero for collocation cost elements were inadvertently left unchanged.

Second, I have changed the price quotes for grounding wire to be consistent with Qwest's deployment practices. (One set of grounding wire price quotes in my

direct testimony were for bare stranded copper wire. Although Qwest's grounding specifications appear to permit stranded bare copper wire, the preferred application is insulated copper wire.) The modified price quotes obtained from RS Means, as well as the modified average quotes appear in the table below.

Table 1. Material Costs for Grounding Cable ($ per foot)

Cable Size	RS Means (XHH)	Cobra Wire & Cable (RHW-LS)	Average
#6	0.28	0.644	0.46
#2	0.61	1.060	0.84
1/0	0.94	1.594	1.23
4/0	1.84	2.665	2.25
350 kcmil	3.00	4.08	3.54
500 kcmil	4.25	5.54	4.90
750 kcmil	6.85	7.71	7.28

Third, in developing the space construction charge (for caged and cageless collocation) to be recovered over five years, an "unloaded" cost (i.e., prior to the application of cost factors) was used, rather than the loaded cost. The correct approach to developing these cost elements begins with the proposed space construction cost which is multiplied by the loading factors recommended by Mr. Weiss. The product is then multiplied by a capital cost factor (which incorporates depreciation, capital costs and taxes) derived from the cost factors

recommended by Mr. Weiss to obtain the annual cost to be recovered over five years. The result is then divided by twelve to obtain the monthly cost to be recovered over five years.

Fourth, the per amp power plant usage cost development did not alter correctly the BDFB investment. In my Direct Testimony, I recommended that Qwest's power cost be adjusted to account for the fact that power usage greater than 60 amps does not use a BDFB, but instead is fed directly from the power plant. (This is consistent with Qwest's assumption, but not Qwest's implementation in its cost model.) I recommended three separate per amp power usage cost elements (and therefore charges) to correspond to this deployment method: a cost for power usage less than 60 amps that includes BDFB investment, a cost for power usage greater than 60 amps that excludes BDFB investment, and a cost for power usage equal to 60 amps that includes 35% of the BDFB investment to correspond to Qwest's model assumption that develops the cost for a 60 amp power feed based on a 35/65 blend of BDFB vs. power plant routing, respectively (and hence use of BDFB investment).

In developing the costs filed with my Direct Testimony, I removed the BDFB investment for power plant usage exceeding 60 amps (and that figure would remain unchanged, but for the application of land and building factors). For

power plant usage less than and equal to 60 amps, I included the BDFB investment but inadvertently failed to change Qwest's default model input from its assumption of 55% overall usage of the BDFB. Thus, while the approach to exclude the BDFB investment for power usage exceeding 60 amps was implemented correctly, the approach to retain the BDFB investment for power usage less than and equal to 60 amps was not implemented correctly because Qwest's model default (mistakenly left unchanged) resulted in retaining 55% of the BDFB investment. The corrected figures retains the full BDFB investment for power usage of less than 60 amps and 35% of the BDFB investment for power usage equal to 60 amps.

I have attached an Exhibit entitled AT&T/WorldCom/XO Joint Pricing Proposal Collocation Revisions which summarizes the results of implementing these changes. The Exhibit is marked as Exhibit RL-6.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

NON-RECURRING COST MODEL

Version 2.2

USER GUIDE

Non Recurring Cost Model
User Guide

1. General Introduction

The ***Non-Recurring Cost Model*** sponsored by AT&T and MCI is a spreadsheet based costing tool that calculates the forward-looking cost of customer connection, disconnection, and change of service. The model also calculates the costs of additional activities related to interconnection, unbundling, and wholesale service. This User Guide is provided to help the user step through the *NRC Model*. Additional detail is provided in the Model Description document.

To enhance the cost model's functionality and to facilitate ease-of-use, the model utilizes advanced features of **Microsoft Excel 7.0**; these features include *visual basic for applications* (VBA) macros and dialog boxes. The macros are routines that serve to automate repetitive processes and to simplify operations and calculations. The dialog boxes allow users to quickly and accurately choose NRC scenarios and to alter the numerous user-adjustable variables via drop-down boxes, check boxes, buttons, and spinners.

The model is composed of 19 unique sheets, including: nine standard Excel worksheets, five VBA module sheets, and five dialog sheets. The following sheets are visible at model start-up:

- *Control* - buttons to run and navigate the model and to present summary results
- *Processes & Calcs* - process steps, calculations, and inputs for the intersection of NRC type and required process
- *Inputs* - presents NRC elements and inputs from dialog box interfaces
- *Batch Output* - detailed outputs and costs for each NRC element
- *Input Record* - detailed record of the selected inputs compared to the default inputs
- *Glossary* - presents telephony acronyms, technical terminology, and descriptions

The following sheets are hidden at model start-up:

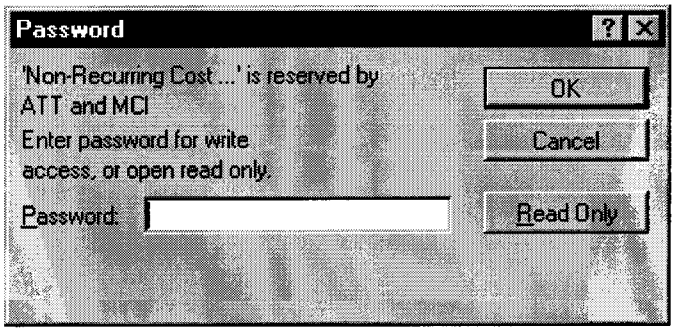
- *dlg NRC model* - first dialog box
- *dlg Customize Batch* - second dialog box
- *dlg Labor Rates* - third dialog box
- *dlg Other NRC* - fourth dialog box
- *dlg Instruction* - NRC Model user instructions
- Print Macro Button - sheet containing the button used for printing the Batch Output on a newly created workbook
- Batch PO Staging - a staging sheet used for printing Batch Output
- Batch Summary Tempy Sheet - a staging sheet used for printing Batch Output
- *Source Code* - visual basic for applications code
- *Copy Input Value Code* - visual basic for applications code
- *Save Option Code* - visual basic for applications code
- *Print File Batch Run Code* - visual basic for applications code
- *Other Inputs Code* - visual basic for applications code

Non Recurring Cost Model
User Guide

The hidden sheets can only be seen directly by going to the toolbar and using the **Format - Sheet - Unhide** command. These sheets are hidden because model users do not need to access these sheets to run the model.

2. Opening the Model

When the user opens the model they will see the following Password protection message.

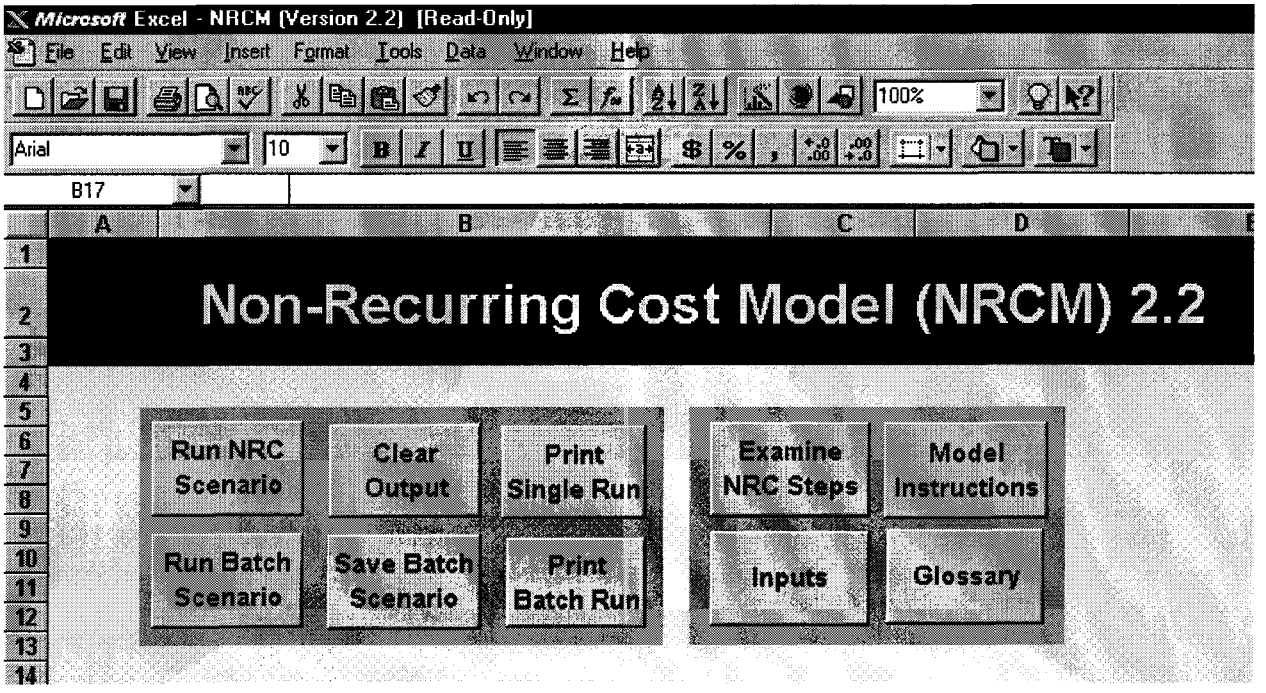


The model user must open the model by clicking the 'Read Only' option. The user will be able to do everything they need to do with the model with the 'Read Only' option. This protection ensures that the user will not inadvertently change the coding in the model. Once opened as 'Read Only' the file may be saved with a *different* file name.

Non Recurring Cost Model
User Guide

3. "Control" Sheet

When the user opens the ***Non-Recurring Cost Model*** they are presented with a "*Control*" sheet.



The "*Control*" sheet presents eight buttons to run and navigate the ***Non-Recurring Cost Model***.

On the left side of the sheet there are six buttons for running the model, printing output, clearing output, and saving data. The following is a description of the functionality provided by each button:

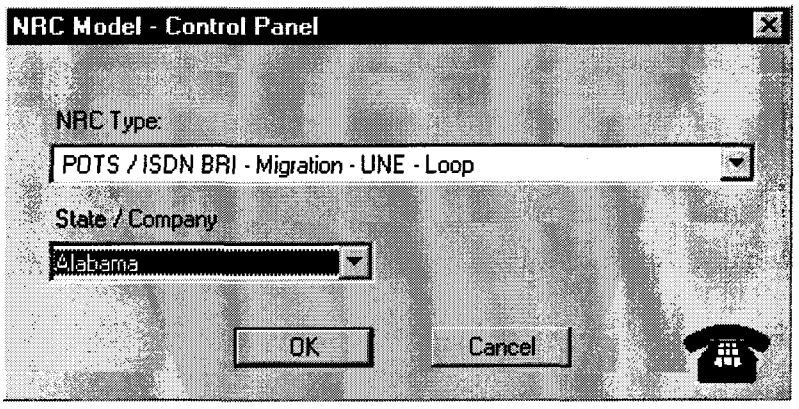
- *Run NRC Scenario* - used to calculate the cost of a single NRC element
- *Run Batch Scenario* - used to calculate the costs of all the NRC elements
- *Clear Output* - used to clear the output from the latest 'NRC Scenario' or 'Batch Scenario'
- *Save Batch Scenario* - used to save the summary data, the inputs, and the output detail for a 'Batch Scenario' to a separate Excel workbook
- *Print Single Run* - used to print the summary data and the inputs from a 'NRC Scenario'
- *Print Batch Run* - used to print the summary data, the inputs, and the output detail for a 'Batch Scenario'

On the right side of the "*Control*" sheet there are four additional buttons. The buttons provide the following additional functionality:

- *Examine NRC Steps* - goes to the "*Processes & Calcs*" sheet where the specific steps costed for a particular NRC element or the complete table of processing steps may be viewed
- *Model Instructions* - used to call up a simple help tool
- *Inputs* - used to quickly go to the *"Input"* sheet
- *Glossary* - used to examine a list of telephony terms and acronyms by going to the "*Glossary*" worksheet

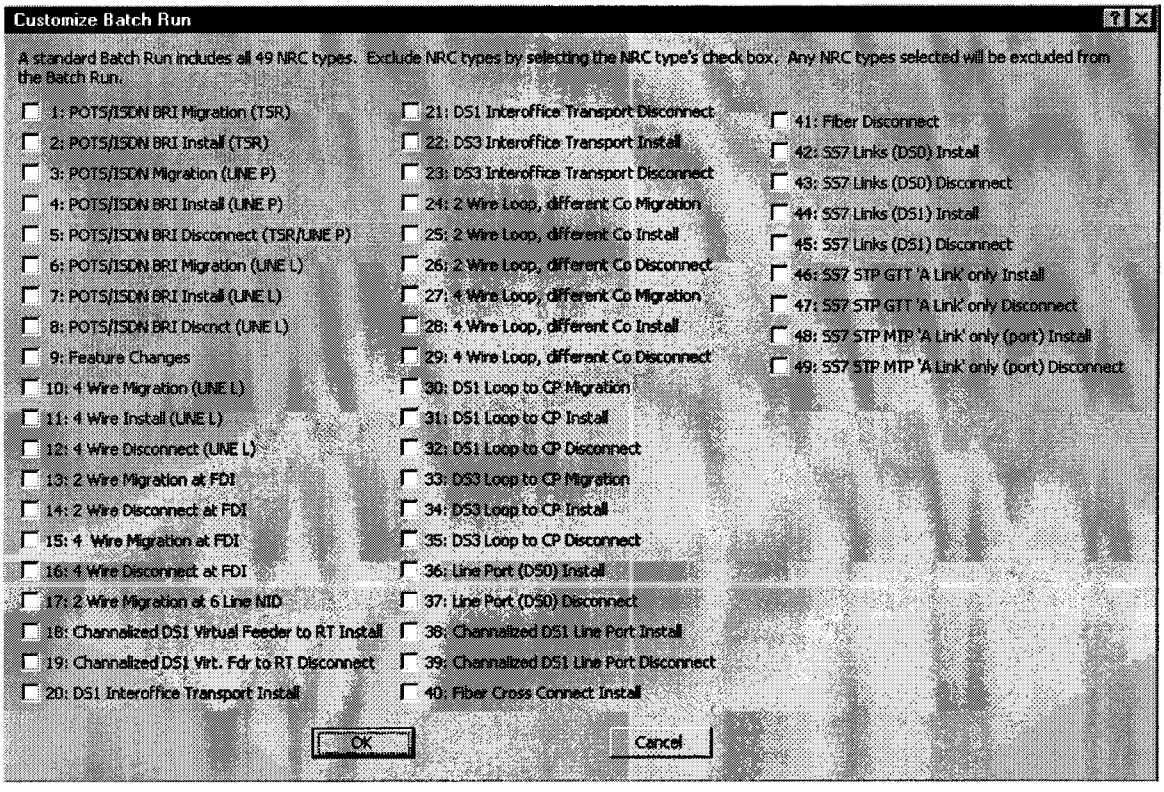
4. Dialog Boxes

The first dialog box, titled "*NRC Model - Control Panel*", allows the user to choose the type of non-recurring charge and the state. For Batch Runs, the NRC Type drop down box is not used because all the NRC Elements are included in a Batch Run.



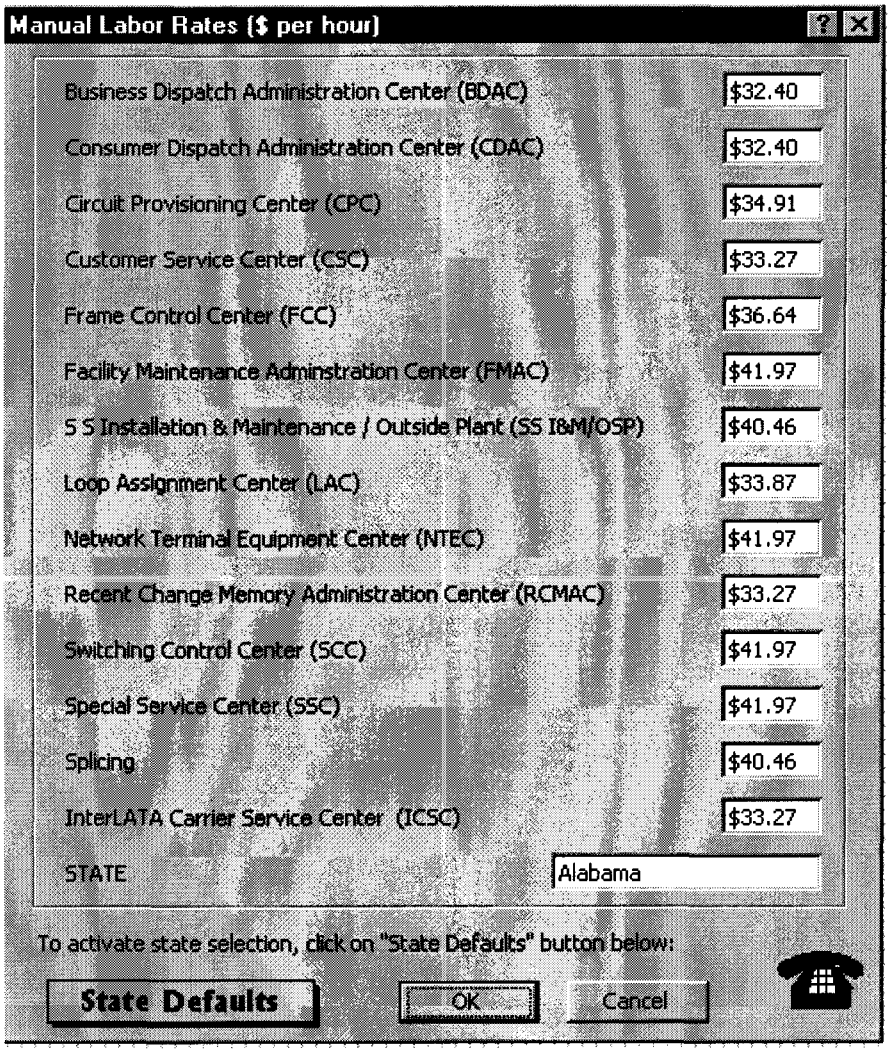
Non Recurring Cost Model
User Guide

The second dialog box, titled "*Customize Batch Run*" allows the user to **exclude** certain elements from the batch run. The user can exclude elements by checking the boxes that correspond to the element. If the user does not wish to exclude any elements, they should ensure that none of the check boxes are selected and then click the OK button to continue.



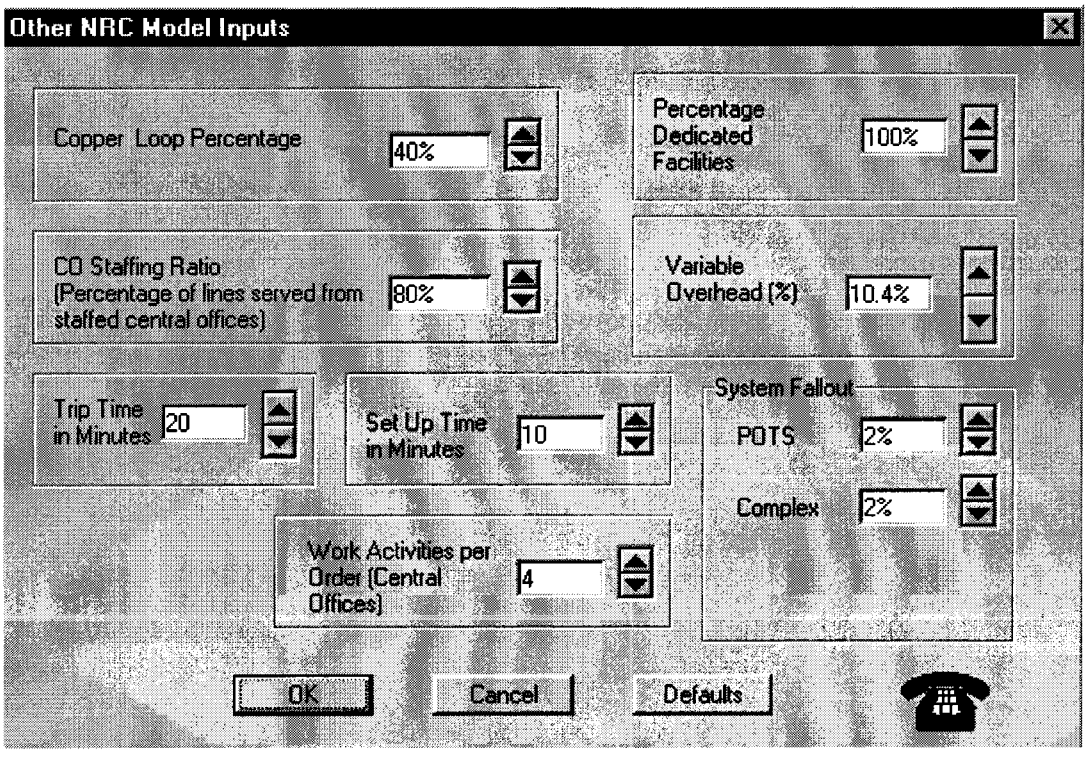
Non Recurring Cost Model
User Guide

The third dialog box, titled "*Manual Labor Rates ($ per hour)*" allows the user to set individual labor rates for 14 technician types. The lower edit box on this dialog box shows the state whose labor rates appear in the other edit boxes. When initially running the model for a state, the user must select the **State Defaults** button. The model will populate the edit boxes with the labor rates for the state. The user must then choose the OK button to continue to the next dialog sheet. If the lower edit box displays the correct name of the state chosen for a model run, the user can immediately click the OK button to continue to the next dialog box.



Non Recurring Cost Model
User Guide

The fourth and final dialog box, titled "*Other NRC Model Inputs*", allows the user to adjust nine categories of inputs; these categories include: the copper loop percentage, CO staffing ratio, trip time, setup times, work activities per order, variable overhead percentage, percentage dedicated facilities, and system fallout percentages for POTS and complex actions. The user can select the model's defaults by selecting the Defaults button. When the user is satisfied with the inputs click the OK button to continue.



5. Running the Model

To run the *Non-Recurring Cost Model* the user must first choose "*Run NRC Scenario*" or "*Run Batch Scenario*" from the "*Control Sheet*". After choosing one of these options, the user will be presented, in succession, with the four dialog boxes noted above. The user has the option to run the model with the default inputs or to adjust them.

When the user chooses *"Run NRC Scenario"*, the user will be presented with a summary output on the "*Control*" sheet; showing NRC element and cost. If the user wishes to see further detail they should use the "*Examine NRC Steps*" button. This button will take the user to the "*Processes & Calcs*" sheet. This sheet will be "filtered" for those activities required for the chosen NRC element. The user can go to the "*Inputs Record*" sheet to examine which of the inputs were used to create the current outputs.

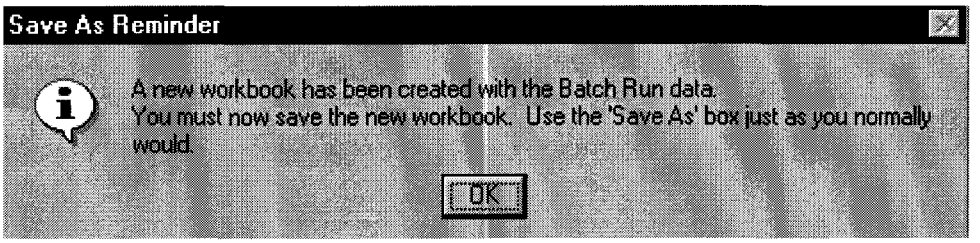
When the user chooses the "*Run Batch Scenario*" the model will produce a comprehensive summary list of NRC types and costs on the "*Control Sheet*". To examine all the required steps for each NRC element, the user should go to the "*Batch Output*" sheet. This sheet records all the steps required for each of the NRC types. Finally, the model also produces a list of the inputs used to create the "Batch Output" in the "Input Record".

Important Note

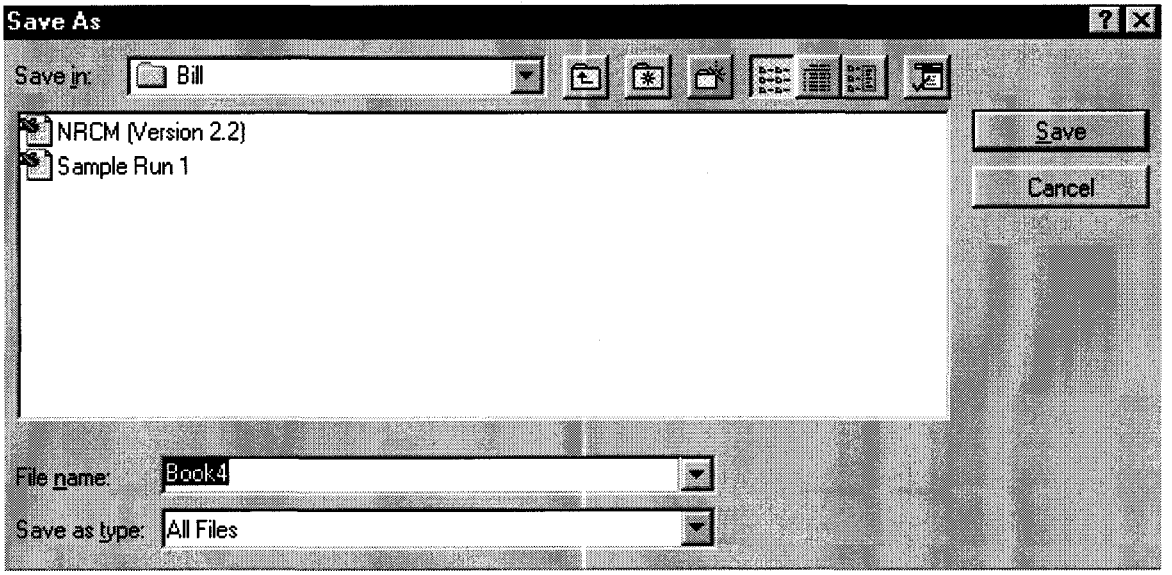
If the user runs another Scenario or Batch Run, the model will overwrite the contents of the "Control", "Batch Output", and "Input Record" sheets. If the user requires a permanent record of a Batch Run, they should use the save option outlined in section 6, page 11 of this users guide.

6. "Saving Batch Scenario" Data

By selecting the "Save Batch Scenario" button the model will save all the data relevant to a Batch Run in a separate Excel workbook. The workbook will include 4 sheets entitled: "*Print Macro Button*", *"Summary"*, *"Batch Output"*, and *"Input Record"*. These sheets will contain the same data that resides in the sheets *"Control"*, *"Batch Output"*, and *"Input Record"* respectively. The model will prompt the user to save the new workbook.



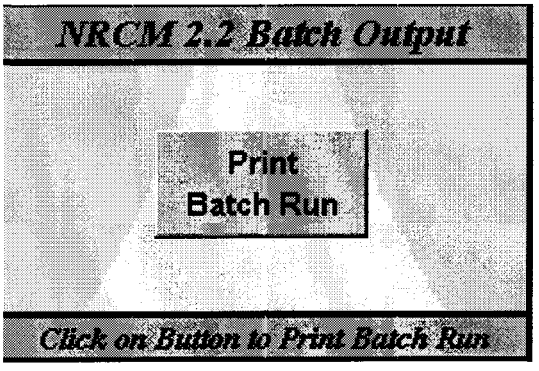
In addition, the user will be prompted to name and choose the directory for the newly created workbook with the following message screen:



The user should use this screen just as they normally would. When the user has named the workbook, the model will remind the user that the data has been saved in a new workbook, the new workbook is still open and return the user to the "Control" screen.

Non Recurring Cost Model
User Guide

Note: When the user chooses to return to the new workbook, the following "Print Batch Run" button will appear. Once the "Print Batch Run" button has been activated, the "Batch Output" sheet will print in its entirety.



7. Printing A "Batch Scenario"

The user can print all the data relevant to a "Batch Scenario" by clicking the "Print Batch Scenario" button on the "Control" sheet. This button invokes a print MACRO that will send three print jobs to the user's default printer. The list below details the three print jobs:

- 1st Print Job
  ⇒ Content - Summary of NRC Elements and costs from the "Control" sheet
  ⇒ Page length - 2 pages

- 2nd Print Job
  ⇒ Content - Summary of Inputs from the "Input Record" Sheet
  ⇒ Page length - 1 page

- 3rd Print Job
  ⇒ Content - "Batch Output" sheet in its entirety
  ⇒ Pages - 75 pages.

The print MACRO is an excellent time saver. However, the user must realize that the total pages sent to your default printer upon execution of the MACRO is 78 pages. (This may be slightly more or less depending on the printer used).

8. Examining Model Mechanics and Algorithms

The user may wish to examine the detail behind the costs for each NRC element. The user can go to the "*Processes and Calcs*" sheet to see the specific electronic and or manual steps that the model used to generate element costs. The example below shows how the user could view only those activities that take place for *POTS / ISDN - Migration - TSR*, the model uses Excel's **Data - Filter - Autofilter** function. By using this function, the "*Processes and Calcs*" sheet will only show activities in which the NRC element and activity step intersect, this intersection is marked by an "**X**". The user should note that NRC scenarios are placed in columns and the process steps are in rows.

NRC #	Alabama - NRC Elements	Total Cost		Total Cost	
3	POTS / ISDN BRI Migration (UNE Platform)	$ 0.21	<-- *with overhead*	$ 0.19	<-- *without overhead*

Clear Autofilter

SERVICE ORDER PROCESS / NON-RECURRING TYPE MATRIX

1	2	3	4	5	6	7	8
					A	B	C
ID No.	Process Flow / Activity	Step	System or Action	Work Center	Probability (%)	Time (minutes)	Rate ($/hour)
1	***Pre Order Steps***						
2	CLEC customer contact	Pre-Order	CLEC Customer Service Representative		NA	-	
3	CLEC requests customer address data, CSR, and appointment from ILEC	Pre-Order	CLEC gateway		NA	-	
4	ILEC gateway requests address data from Administrative Information System and CSR	Pre-Order	Premis, ALOC, BOSS, CRIS		100.0%	-	R
6	***Ordering Steps***						
7	CLEC customer service representative inputs LSR information into LOS	Order	ACTIVIEW		NA		
8	ILEC gateway receives, validates and logs LSR, returns FOC, and passes LSR to SOG	Order	ILEC gateway, STAREP, DOE		100.0%	-	R
10	ILEC SOG retrieves CSR data, formats and passes to SOP	Order	BOSS, SOP		100.0%	-	R
11	***Provisioning Processing Steps***						
13	SOP sends request to SOAC	Provisioning	SOP		100.0%	-	R
14	SOAC analyzes order, generates assignment requests for OSP, COE, IOF, etc.	Provisioning	SOAC		100.0%	-	R
20	SOAC receives COE, OSP, IOF, etc.	Provisioning	SOAC		100.0%	-	R
27	SOAC delivers recent change translation information	Provisioning	MARCH (ASAP for ISDN BRI)		100.0%	-	R
29	MARCH updates LDS	Provisioning	MARCH (ASAP for ISDN BRI)		100.0%	-	R
198	***Fall Out Steps***						
199	Fall Out: RMAs forwarded to PAWS for reconciliation	Provisioning	CPU Time		2.0%		R
200	Fall Out: Pull and analyze order: RCMAC	Provisioning	ILEC manual activity	RCMAC	2.0%	2.50	$ 33.27
201	Fall Out: Resolve fallout: RCMAC	Provisioning	ILEC manual activity	RCMAC	2.0%	15.00	$ 33.27
217	***Close Order Provisioning Steps***						
218	SOAC updates SOP	Provisioning	SOAC		100.0%	-	R
219	SOAC updates WFA, NSDB, LMOS, BOSS, CRIS, etc.	Provisioning	SOAC		100.0%	-	R
221	SOP completes LSR	Provisioning	SOP		100.0%	-	R
222	ILEC gateway notifies CLEC of completed order	Provisioning	ILEC gateway		NA		
223	ILEC billing system issues final bill to migrating customer	Provisioning	ILEC gateway		NA		
224	***End of Process Steps***						

AT&T/WORLDCOM/XO JOINT PRICING PROPOSAL
COLLOCATION REVISIONS

		Joint AT&T/ Worldcom/XO Pricing Proposal Original		Joint AT&T/ Worldcom/XO Pricing Proposal Revised	
		Joint Proposal		Joint Proposal	
		Recurring	NRC	Recurring	NRC
COLLOCATION					
Collocation Entrance Facility, per fiber pair					
Standard per Fiber pair		$8.58		$8.16	
Cross Connect per Fiber		$12.57		$12.23	
Express per Cable		$133.66		$129.83	
-48 Volt DC Power Usage, per Ampere, per Month					
Power Plant, per amp	<60 amps	$9.56		$10.85	
	>60 amps	$7.45		$7.18	
	=60 amps	$8.19		$8.46	
AC Power Feed (Backup Power)					
AC Power Feed – per Amp, per Month					
120 V		$16.85		$16.62	
208 V, Single Phase		$29.20		$28.80	
208 V, Three Phase		$50.52		$49.83	
240 V, Single Phase		$33.69		$33.23	
240 V, Three Phase		$58.29		$57.49	
480 V, Three Phase		$116.58		$114.99	
Interconnection Tie Pairs (ITP)					
Per DS1		$1.33		$1.28	
Per DS3		$13.39		$12.91	
Central Office Clock Synchronization					
Synchronization – Composite Clock, per Port		$6.48		$6.25	
Equipment Bay -recurring, per Shelf		$3.16		$3.04	
Space Construction					
5 year payments (recurring for 5 yrs)		$39.80		$48.23	
on-going maintenance		$2.52		$3.06	
Space Construction (Standard 60 Amp Power Feed)					
Site Preparation					
Cage- Up to 100 Sq. Ft	5 yr payments	$68.46		$84.71	
	maintenance	$4.34		$5.37	
Cage- 101- 200 Sq. Ft	5 yr payments	$80.68		$99.83	
	maintenance	$5.12		$6.33	
Cage- 201- 300 Sq. Ft	5 yr payments	$89.79		$111.11	
	maintenance	$5.69		$7.04	
Cage- 301- 400 Sq. Ft	5 yr payments	$97.18		$120.25	
	maintenance	$6.16		$7.62	
Grounding					
2/0 AWG - per Foot		$0.0171	$11.29	$0.0146	$9.60
1/0 AWG - per Foot		$0.0285	$18.79	$0.0250	$16.48
4/0 AWG - per Foot		$0.0324	$21.35	$0.0279	$18.38
350 kcmil - per Foot		$0.0449	$29.62	$0.0428	$28.22
500 kcmil - per Foot		$0.0501	$33.01	$0.0461	$30.42
750 kcmil – per Foot		$0.0767	$50.57	$0.0745	$48.09

CERTIFICATE OF SERVICE

ACC Docket No. T-00000A-00-0194

I hereby certify that on the 25th of June 2001, the original and ten (10) copies of ***WorldCom, AT&T, and XO's Notice of Filing Errata***, in the above-referenced matter, were sent via FedEx next business morning delivery to:

Docket Control
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007

And, I further certify that on the 25th day of June 2001, three (3) copies of the above-named errata was sent via FedEx, next business morning delivery, to:

Jane Rodda Administrative Law Judge Hearing Division Arizona Corporation Commission 1200 West Washington Street Phoenix, AZ 85007

And one true and correct copy of the foregoing was sent via FedEx, next business morning delivery, to:

Maureen Scott ACC – Legal Division 1200 W. Washington Street Phoenix, AZ 85007	William Dunkel Dunkel and Associates 8625 Farmington Cemetery Road Pleasant Plains, IL 62677
Lyn Farmer Arizona Corporation Commission 1200 West Washington Street Phoenix, AZ 85007	Deborah Scott, Director ACC – Utilities Division 1200 W. Washington Street Phoenix, AZ 85007
Kathryn E. Ford Qwest Corporation 1801 California Street, Suite 4900 Denver, CO 80202	Timothy Berg Theresa Dwyer Fennemore Craig, P.C. 3003 North Central Avenue, Suite 2600 Phoenix, AZ 85012-2913

Thomas F. Dixon, Jr. WorldCom 707 17th Street Denver, CO 80202	Eric S. Heath Sprint Communications Company L.P. 100 Spear Street, Suite 930 San Francisco, CA 94105
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